

1 J. Stephen Peek  
2 (Nevada Bar No. 1758)  
3 Erica C. Medley  
4 (Nevada Bar No. 13959)  
5 HOLLAND & HART LLP  
6 9555 Hillwood Drive, 2nd Floor  
7 Las Vegas, NV 89134  
8 Tel: 702.669.4600  
9 Fax: 702.669.4650  
10 speek@hollandhart.com

11 Tariq Mundiya (admitted *pro hac vice*)  
12 Jeffrey B. Korn (admitted *pro hac vice*)  
13 WILLKIE FARR & GALLAGHER LLP  
14 787 Seventh Avenue  
15 New York, New York 10019  
16 (212) 728-8000  
17 tmundiya@willkie.com  
18 jkorn@willkie.com

19 Michael J. Gottlieb (admitted *pro hac vice*)  
20 WILLKIE FARR & GALLAGHER LLP  
21 1875 K Street, NW  
22 Washington, DC 20006  
23 (202) 303-1000  
24 mgottlieb@willkie.com

25 *Attorneys for Plaintiffs*  
26 *Jysan Holding, LLC; and*  
27 *Jusan Technologies Ltd.*

28 **UNITED STATES DISTRICT COURT**

1 **DISTRICT OF NEVADA**

2 JYSAN HOLDING, LLC, a Nevada Limited  
3 Liability Company; JUSAN  
4 TECHNOLOGIES LTD, an England and  
5 Wales Limited Company;

6 Plaintiff,

7 v.

8 REPUBLIC OF KAZAKHSTAN, a foreign  
9 sovereign state; THE AGENCY FOR  
10 REGULATION AND DEVELOPMENT  
11 OF THE FINANCIAL MARKET OF THE  
12 REPUBLIC OF KAZAKHSTAN, a  
13 Kazakhstan Government agency; THE  
14 ANTI-CORRUPTION AGENCY OF THE  
15 REPUBLIC OF KAZAKHSTAN, a  
16 Kazakhstan Government anti-corruption

17 **Case No. 2:23-cv-00247-JAD-VCF**

18 **STIPULATION TO EXTEND TIME TO  
19 RESPOND TO MOTION TO DISMISS  
20 (First Request)**

1 agency ; THE FINANCIAL MONITORING  
2 AGENCY OF THE REPUBLIC OF  
3 KAZAKHSTAN, a Kazakhstan Government  
4 agency; THE COMMITTEE FOR  
5 NATIONAL SECURITY OF  
6 KAZAKHSTAN, a Kazakhstan Government  
7 intelligence agency; MADINA  
8 ABYLKASSYMOVA, an individual;  
OLZHAS KIZATOV, an individual;  
ARMAN OMARBEKOV, an individual;  
and ADILBEK DZHAKSYBEKOV, an  
individual,

Defendants.

Defendants Madina Abylkassymova, Olzhas Kizatov, and Arman Omarbekov (the “Government Official Defendants”) filed a Motion to Dismiss the Complaint on April 13, 2023 (ECF No. 23). The current deadline for Plaintiffs Jysan Holding, LLC and Jusan Technologies Ltd (“Plaintiffs”) to respond to the Motion to Dismiss is April 27, 2023.

Plaintiffs require additional time to respond to the Motion in light of the complexity of the issues involved. Plaintiffs and the Government Official Defendants have conferred and reached agreement on an extension of Plaintiffs’ time to respond. This is the first stipulation for extension of time to respond to the Motion.

**IT IS HEREBY STIPULATED AND AGREED** that Plaintiffs’ time to respond to the Government Official Defendants’ Motion to Dismiss is extended to and including **May 4, 2023**.

DATED this 21st day of April, 2023.

**MCNUTT LAW FIRM, P.C.**

/s/ Dan McNutt

Daniel R. McNutt, Bar No. 7815  
11441 Allerton Park Drive, #100  
Las Vegas, Nevada 89135

*Counsel for Defendants Madina  
Abylkassymova,  
Olzhas Kizatov, and Arman Omarbekov*

**HOLLAND & HART LLP**

/s/ J. Stephen Peek

J. Stephen Peek, Bar No. 1758  
9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134

*Attorneys for Plaintiffs  
Jysan Holding, LLC; and  
Jusan Technologies Ltd.*

1                   *Jysan Holding, LLC, et al. v. Republic of Kazakhstan, et al.*  
2                    Case No. 2:23-cv-00247-JAD-VCF  
3                    *Stipulation and Order to Extend Time to Respond to Motions to*  
4                    *Dismiss and to Stay Discovery*

5                   **ORDER**

6  
7                   **IT IS SO ORDERED.**

8  
9  
10                  UNITED STATES DISTRICT JUDGE/  
11                  UNITED STATES MAGISTRATE JUDGE

12                  DATED: \_\_\_\_\_

13                  Case No.: 2:23-cv-00247-JAD-VCF